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July 5, 2022

Hon. Edward S. Kiel, U.S.M.J.
United States District Court, District of New Jersey
2 Federal Square, Courtroom 8
Newark, NJ 07102

Via: ECF

Re: Al Ummah Community Center et al. v. Teaneck et al.,
Civ. No.: 20-cv-14181 (KM)(ESK)

Dear Judge Kiel,

I hope this correspondence finds you well. Please accept this letter as a joint status letter in advance of the next conference:

1. Written Discovery Propounded by the Plaintiffs upon the Defendants: Defendants have responded. Plaintiffs reserve the right to assert additional deficiencies as identified in due course.

2. Written Discovery Propounded by the Defendants upon the Plaintiffs: Plaintiffs have begun producing documents, on a rolling basis, in response to Defendant ZBA's document requests. Defendant ZBA will be sending a letter detailing specific deficiencies in Plaintiffs' responses to its discovery demands this week. Plaintiffs have not responded to the Township Defendants' discovery demands, which were served on April 26, 2022, and are now overdue. Plaintiffs have not responded to the discovery demands of the individual Zoning Board Defendants (not including Defendant Atif Rehman), which were served on May 26, 2022, and are now overdue. Plaintiffs have not responded to Defendant Mr. Rehman's discovery demands, which were served on June 2, 2022. All Defendants reserve the right to assert additional deficiencies, as identified in due course. Plaintiffs object to Defendants' discovery demands as duplicative and request that each Defendant review Plaintiffs' discovery responses and documents, and advise which of the requests remain unanswered. Defendants object to this request as it does not comport with the rules of discovery and demand that Plaintiffs respond to all outstanding discovery demands. Plaintiffs assert that their responses, thus far, are fully responsive to all outstanding discovery demands.

3. The deposition of Defendant Mr. Rehman began on June 17, 2022. The continuation of the same is scheduled for July 15, 2022.

4. Defendant ZBA has served Deposition Notices under Rule 30(b)(6). Plaintiffs object to the form and timing of those deposition notices, and reserve the right to seek a protective order should a meet and confer fail on this issue.

5. Defendant ZBA requests that a full deposition schedule be stipulated or so ordered. Plaintiffs object for a host of reasons that will be presented to Court if the parties cannot come to an agreement.

Respectfully submitted,
s/Aymen A. Aboushi
Aymen A. Aboushi, Esq.

Cc: All counsel of record via ECF